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COUNTY OF SONOMA
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May 24, 1993

Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington, D.C. 20554

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MAY 25 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

FCC MAIL BRANCH

Dear Ms. Searcy:

Enclosed please find an original and nine copies of Comments submitted by the County of Sonoma, California, in response to FCC Docket 92-235. Please ensure that they are distributed to each Commissioner.

Thank you.

Sincerely,

Before
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20544

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MAY 25 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Replacement of Part 90 by)
Part 88 to Revise the Private)
Land Mobile Radio Services and)
Modify the Policies Governing)
Them)

PR Docket 92-235

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MAY 25 1993

To: The Commission

FCC MAIL BRANCH

COMMENTS OF
County of Sonoma

INTRODUCTION

The County of Sonoma covers an area of approximately 1,576 square miles, including coastal mountains and interior valleys. The population in 1990 was 388,222 and a 2% annual growth rate is projected for the area. There is one major city, Santa Rosa, with a population of approximately 130,000 and many smaller cities with populations under 35,000. The County is responsible for operating a radio system that includes not only Sheriff's patrols, but medical coordination, emergency operations, fire response units, a transit system, the Sonoma County Water Agency, jail facilities, and other entities that effect the lives of every person living or working within the County. Additionally, medical radios operate between County lines.

COMMENTS

The County of Sonoma has carefully examined the proposals contained in this docket and has a number of concerns relative to the effect the proposed changes would have on the County's Communications Systems.

While the County does not suffer from a shortage of available channels at this time, the increased desire to use radio for mobile data terminals and other uses, as other entities are doing, means that more channels will be needed. Additionally, the City of Santa Rosa, as well as other entities, will be requesting more channels as their needs increase. The present financial condition among Government entities in California has placed a temporary hold on expansion of services. There simply is no money available for upgrades, equipment replacement, or expansion.

The attempt to reallocate, or refarm, the spectrum is timely, but the proposal as presented would have an extremely detrimental effect on Sonoma County. It would be impossible to implement at this time, due not only to cost, but for a variety of technical reasons. Vast areas of the County would be without adequate police and fire protection if the proposals are approved.

Negative aspects of the proposal include:

1. Reduction of channel bandwidth to 5 khz in the 150-160 MHz bands. Not only is there not equipment presently on the market that will meet these requirements, but even if there was the County could not afford wholesale replacement of equipment.
2. The proposed division of channels in all bands would make all existing equipment obsolete and force the County to replace some 650 portable radios, 790 mobiles, and base stations at a cost of over \$3 million.

3. Reducing frequency deviation to 3 KHz would result in signal degradation, making it impossible for police in many areas of the County to be heard. The County has spent much time and money in recent years to overcome the "noise" problem caused by terrain and other factors. The effect would be the same as lowering the power of a 5 watt hand-held portable radio to 3 watts, which is totally inadequate in many areas of Sonoma County. Public safety would be severely impacted.

4. The proposal to insert other services into the "bank" of channels allocated to Public Safety would make coordination virtually impossible. The net result will be increased interference leading to unreliable communications.

5. One of the most dangerous provisions of the proposed rules is the reduction in power of mountain top stations to 5 watts. The County has 9 such sites today, yet there are still some areas which receive less than ideal service. The power reduction would require at least 3 additional sites, cost from \$600,000 to over \$2 million. The greatest concern is that these sites may be unobtainable, leading to vast areas of the County that will have no fire, police or medical coverage. The County may have no practical way to overcome this power limitation.

6. Future use of radio for data services will be impaired if the bandwidth is narrowed. This can affect officer safety and prevent use of modern techniques to solve the County's budget problems.

RECOMMENDATIONS

- 1. Power limitations must be based on the power required to serve the individual agencies' areas of responsibility, not on a "one size fits all" concept as proposed.**
- 2. Any proposed change involving equipment should consider a migration plan to allow for gradual replacement of equipment. This would include changing bandwidth, modulation limits, etc.**
- 3. Service block allocations for public safety must remain intact, not divided among various types of services, allowing for a single coordination body (APCO).**
- 4. Any changes in bandwidth should take into account the emerging data technologies and the increasing use of mobile data terminals and other devices.**
- 5. Bandwidths should not be reduced beyond the point agreed to as feasible by all manufacturers and users.**

CONCLUSION

The County of Sonoma recognizes the need to reform the spectrum, and make more efficient use of scarce radio resources. However, no rules should be adopted that will reduce the capability of a Public Safety Agency's radio system to provide the necessary communications coverage. The proposed rules will impact public safety in Sonoma County. In order to mitigate the expenses of any conversion, an appropriate transition period should be provided, allowing old and new equipment to operate side-by-side, without requiring the entire radio system to be changed. The bandwidth must allow for future use of mobile data terminals and other digital devices. Blocks of frequencies must remain dedicated for Public Sector Use, not interspersed with commercial entities, in order to assure adequate coordination. Also, any changes in the rules must take into account the financial impacts and the public sector's ability to pay. The rules proposed in this Docket do not adequately provide these provisions.

Respectfully Submitted,



Jim Harberson, Chairman

Sonoma County Board of Supervisors

575 Administration Drive

Santa Rosa, Ca 95403